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Parris N. Glendening
Governor

Jane T. Nishida
Secretary

June 21, 2000

Mr. Kelley A. Chase
U.S. Environmental Protection Agency
Region III (3HS21)
1650 Arch Street
Philadelphia PA 19103-2029

Re: Keystone Sanitation Landfill Superfund Site, Union Township, PA
Operable Unit 1 Proposed Remedial Action Plan

Dear Mr. Chase:

The Maryland Department of the Environment's Waste Management Administration has reviewed the final Proposed Remedial Action Plan for the Keystone Sanitation Landfill Superfund site, which you provided to Mr. Rick Collins on June 1, 2000. Comments on this document are enclosed for your review and consideration.

If you have any questions, please contact me at (410) 631-3437.

Sincerely,

Karl F. Kalbacher, Administrator
Environmental Restoration and
Redevelopment Program

KFK:bjm

cc: Mr. Richard Collins

Maryland Department of the Environment
Waste Management Administration
Comments on:
Keystone Sanitation Landfill Superfund Site, Union Township, PA
Operable Unit 1 Proposed Remedial Action Plan

1) Based on the premise that the primary contaminants of concern at the site are methane and volatile organic compounds (VOCs), the proposed enhanced landfill gas extraction (ELGE) system seems to be a more aggressive approach to landfill management than the classic method of capping, leachate collection and monitoring. There does appear to be an increased potential for the release of liquid contamination to groundwater during the installation of the numerous deep ELGE wells that will be installed under this plan.

2) Page 11, VOC Removal – If there is a potential for the release of liquid contaminants during the installation of the ELGE wells, then the timing of the baseline sampling of VOCs should be more clearly stated in the document. As proposed, it is unclear whether the baseline will be conducted "prior to the startup" of the remedial action or "prior to the startup" of the ELGE system. The Record of Decision (ROD) requires the reduction of 90% in the concentration of selected target VOCs. Consequently, it is to the advantage of the Responsible Parties to maximize the baseline measurement of the target VOCs. A high baseline measurement of target VOCs will result in a greater mass of contamination left behind in the landfill.

3. Page 11, Leachate Monitoring – Again, it would be helpful if the meaning of "year 1" could be clarified. Is "year 1" the first year of system operation or the first year following the ROD?

4. Page 13, Post-Construction Monitoring, item 3 – Flare VOC emissions will be based on calculations using analyzed influent rates and the destruction efficiency of the flare. It would probably be more accurate to directly measure the VOC emissions from the flare.

5. Page 20, Short Term Effectiveness – As discussed earlier, the installation of numerous ELGE wells through the waste has the potential to release liquids that are either contained or otherwise trapped within the fill to groundwater. The discussion of short-term effectiveness does not seem to address this potential threat.